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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

**CARLIE SHERMAN, ANNA GOZUN,
AMANDA NASH, and JOHN DOE** on behalf of
themselves and all similarly situated persons,

PLAINTIFFS,

v.

TRINITY TEEN SOLUTIONS, INC., a
Wyoming corporation; **TRIANGLE CROSS
RANCH, LLC**, a Wyoming limited liability
corporation; **MONKS OF THE MOST
BLESSED VIRGIN MARY OF MOUNT
CARMEL, d/b/a MYSTIC MONK COFFEE**, a
Wyoming corporation; **GERALD E.
SCHNEIDER; MICHAEELEEN P.
SCHNEIDER; ANGELA C. WOODWARD;
JERRY D. WOODWARD; DANIEL
SCHNEIDER; MATHEW SCHNEIDER;
MARK SCHNEIDER; KARA WOODWARD;
KYLE WOODWARD; THOMAS GEORGE;
JUDITH D. JEFFERIS; DALLY-UP, LLC**, a
Wyoming limited liability corporation; **ROCK
CREEK RANCH, INC.**, a Delaware corporation;
DIOCESE OF CHEYENNE, a Wyoming
corporation; and the **SOCIETY OF OUR LADY
OF THE MOST HOLY TRINITY**, a Texas
corporation; and **NEW MOUNT CARMEL
FOUNDATION, INC.**, a Wyoming corporation,

Civil Case No. 20-CV-00215-SWS

DEFENDANTS.

**DEFENDANTS TRIANGLE CROSS RANCH, LLC, GERALD E. SCHNEIDER,
MICHAEELEN P. SCHNEIDER, MATTHEW SCHNEIDER, MARK SCHNEIDER, AND
THOMAS GEORGE’S MOTION TO DISMISS**

Defendants Triangle Cross Ranch, LLC, Gerald E. Schneider, Michaelleen P. Schneider, Matthew Schneider, Mark Schneider, and Thomas George (“TCR Defendants”), through their attorneys White and Steele, P.C., hereby move under Fed. R. Civ. P. 12(b)(6) to dismiss all claims with prejudice against the TCR Defendants for failure to state a claim upon which relief may be granted. The TCR Defendants have submitted a written brief in support of this Motion, incorporated here by reference. TCR Defendants move for dismissal based on the following grounds:

1. Plaintiffs’ RICO claim is untimely (Count 4);
2. Plaintiffs cannot establish RICO standing (Count 4);
3. Plaintiffs fail to state the remaining substantive RICO elements of (1) conduct (2) of an enterprise (3) through a pattern (4) of racketeering activity (Count 4);
4. Plaintiffs fail to state the required predicate violations pursuant to the Racketeer Influenced and Corrupt Organizations Act (RICO) (Count 4);
5. Plaintiffs fail to state a cognizable labor or services theory pursuant to the Trafficking Victims Protection Act (TVPA) (Counts 1-3);
6. Plaintiffs fail to state the required element of compulsion under the TVPA (Counts 1-3); and,
7. Plaintiffs fail to state knowing violations of the TVPA (Counts 1-3).

WHEREFORE Defendants respectfully ask the Court to dismiss the plaintiffs’ claims against the TCR Defendants, with prejudice.

Respectfully submitted this 22nd day of January, 2021.

WHITE & STEELE, P.C.

/s/ Rachel E. Ryckman

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TRIANGLE CROSS RANCH, LLC

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MICHAEELEN P. SCHNEIDER

MATTHEW SCHNEIDER;

MARK SCHNEIDER and

THOMAS GEORGE

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed on January 22, 2021, with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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/s/ Rachel E. Ryckman
For White and Steele